

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, APRIL MUNIZ,
MARCUS MARTIN, NATALIE ROMERO,
CHELSEA ALVARADO, JOHN DOE, and
THOMAS BAKER,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES
ALEX FIELDS, JR., VANGUARD
AMERICA, ANDREW ANGLIN,
MOONBASE HOLDINGS, LLC, ROBERT
“AZZMADOR” RAY, NATHAN DAMIGO,
ELLIOT KLINE a/k/a/ ELI MOSLEY,
IDENTITY EVROPA, MATTHEW
HEIMBACH, MATTHEW PARROTT a/k/a
DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS,
LEAGUE OF THE SOUTH, JEFF SCHOEP,
NATIONAL SOCIALIST MOVEMENT,
NATIONALIST FRONT, AUGUSTUS SOL
INVICTUS, FRATERNAL ORDER OF THE
ALT-KNIGHTS, MICHAEL “ENOC”
PEINOVICH, LOYAL WHITE KNIGHTS OF
THE KU KLUX KLAN, and EAST COAST
KNIGHTS OF THE KU KLUX KLAN a/k/a
EAST COAST KNIGHTS OF THE TRUE
INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3:17-cv-00072-NKM

**PLAINTIFFS’ MOTION TO WITHDRAW
RAYMOND P. TOLENTINO AS COUNSEL OF RECORD**

Pursuant to Local Rule 6(i), Plaintiffs respectfully move the Court to withdraw Mr. Raymond P. Tolentino as counsel of record. Mr. Tolentino was granted permission to practice before this court *pro hac vice* on October 15, 2021. *See* ECF No. 1234. Mr. Tolentino will soon depart from the law firm of Kaplan Hecker & Fink LLP. In light of Mr. Tolentino's departure, Plaintiffs respectfully request that this Motion be granted. It should further be noted that, notwithstanding this withdrawal, representation of Plaintiffs in this matter shall otherwise remain unchanged.

Raymond P. Tolentino
KAPLAN HECKER & FINK LLP
1050 K Street NW, Suite 1040
Washington, DC 20001
Telephone: (212) 763-0883
Facsimile: (212) 564-0883
rtolentino@kaplanhecker.com

Date: January 26, 2024

Respectfully submitted,

/s/ Raymond P. Tolentino
Raymond P. Tolentino (*pro hac vice*)
KAPLAN HECKER & FINK LLP
1050 K Street NW, Suite 1040
Washington, DC 20001
Telephone: (212) 763-0883
Facsimile: (212) 564-0883
rtolentino@kaplanhecker.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on January 26, 2024, I served the following via ECF:

Elmer Woodard
5661 US Hwy 29
Blairs, VA 24527
isuecrooks@comcast.net

James E. Kolenich
Kolenich Law Office
9435 Waterstone Blvd. #140
Cincinnati, OH 45249
jek318@gmail.com

*Counsel for Defendants Nathan Damigo,
Identity Europa, Inc. (Identity Evropa)*

Bryan Jones
106 W. South St., Suite 211
Charlottesville, VA 22902
bryan@bjoneslegal.com

*Counsel for Defendants Michael Hill,
Michael Tubbs, and League of the South*

Joshua Smith
Smith LLC
807 Crane Avenue
Pittsburgh, PA 15216-2079
joshsmith2020@gmail.com

*Counsel for Defendants Matthew Parrott,
Traditionalist Worker Party, and Matthew
Heimbach*

David L. Campbell
Justin Saunders Gravatt
Duane, Hauck, Davis & Gravatt, P.C.
100 West Franklin Street, Suite 100
Richmond, VA 23220
dcampbell@dhdglaw.com
jgravatt@dhdglaw.com

Counsel for Defendant James A. Fields, Jr.

William Edward ReBrook, IV
The ReBrook Law Office
6013 Clerkenwell Court
Burke, VA 22015
edward@rebrooklaw.com
rebrooklaw@gmail.com

*Counsel for Defendants Jeff Schoep, National
Socialist Movement, Nationalist Front,
Matthew Parrott, Traditionalist Worker
Party, and Matthew Heimbach*

CERTIFICATE OF SERVICE

I further hereby certify that on January 26, 2024, I also served the following via electronic mail:

Richard Spencer
richardbspencer@icloud.com
richardbspencer@gmail.com

Christopher Cantwell
christopher.cantwell@gmail.com

Vanguard America
c/o Dillon Hopper
dillon_hopper@protonmail.com

Robert “Azzmador” Ray
azzmador@gmail.com

Elliott Kline a/k/a Eli Mosley
eli.f.mosley@gmail.com
deplorabletruth@gmail.com
eli.r.kline@gmail.com

I hereby certify that on January 26, 2024, I also served the following by physical mail:

Jason Kessler
6256 Bullet Dr.
Crestview, FL 32536

Richard Spencer
734 Clearwater Drive
Whitefish, MT 59937

1100 Wythe Street, Unit 1812
Alexandria, VA 22313

Vanguard America
c/o Dillon Hopper
383 Hazzard Street
Scottsburg, IN 47170

Moonbase Holdings, LLC
c/o Andrew Anglin
6827 N. High Street, Ste. 121
Worthington, OH 43085

P.O. Box 208
Worthington, OH 43085

Robert “Azzmador” Ray
22345 Cherry Lane
Frankston, TX 75763

Elliott Kline a/k/a Eli Mosley
117 Mesa Drive
Reading, PA 19608

Jeff Schoep
P.O. Box 13768
Detroit, MI 48213

Augustus Sol Invictus
424 E. Central Blvd #156
Orlando, FL 32801

22803 Rausch Avenue
Eastpointe, MI 48021

Fraternal Order of the Alt-Knights
c/o Kyle Sean Chapman
52 Lycett Circle
Daly City, CA 94015

Loyal White Knights of the Ku Klux Klan
c/o Chris and Amanda Barker
2364 US Highway 158 E
Yanceyville, NC 27379

East Coast Knights of the Ku Klux Klan
a/k/a East Coast Knights of the True Invisible
Empire
26 South Pine St.
Red Lion, PA 17356

/s/ Raymond P. Tolentino
Raymond P. Tolentino
KAPLAN HECKER & FINK LLP

Counsel for Plaintiffs